REMARKS

Reconsideration of this application, as amended, is respectfully requested.

By this Amendment, Claims 35-52 are pending in this application. Claims 13-34 have been cancelled and new Claims 35-52 have been added with Claims 35, 41, and 47 being independent claims. All claims are believed to be in condition for allowance of which is respectfully requested.

The Examiner rejects now cancelled claims 13-34 under 35 U.S.C. §112, first paragraph, as containing subject matter which was not described in the specification in such a way as to enable one skilled in the art to which it pertains, or with which it is most nearly connected, to make and/or use the invention. The Examiner outlines three points of rejection, each of which is independently addressed herein.

Firstly, the Examiner asserts that the specification is not clear on what the "analyzing means" is actually analyzing, what is the result of the analysis, and how the result is being used. The Examiner states that the nature of the analysis is totally unknown.

The Examiner's attention is directed to page 6, lines 12-13 of the specification. The specification states that module 8 comprises "second means 14 that analyze the predicates in the records." Thus, the specification clearly identifies that the predicates are being analyzed. Page 6, line 21 of the specification refers to "values of the predicates issued by the second means 14." Thus, the specification clearly identifies that the result of the analysis are selective values of the predicates. Page 6, lines 24-25 of the specification states that "fourth means 16 creates a nomenclature for the predicates issued by the second means 14." Thus, the specification clearly identifies that the result is being used to create a nomenclature.

Further to this point, Fig. 2 clearly shows second means 14 labeled as "Analysis of the Predicates," identifying that it is the predicates that are being analyzed. Also, Fig. 2 shows,

by way of a unidirectional arrow, that the result of the analyzing means is used to create the nomenclature, identified by fourth means 16 labeled "Creation of the Nomenclature."

Secondly, the Examiner asserts that the specification states that the nomenclature derives from a means which encodes values, but the means which encodes values is described as using the nomenclature, therefore suggesting that the nomenclature is used before it is actually even created.

It is important to note that the titles "second means," "third means," and "fourth means" denote a unique moniker for each element and do not necessarily denote an order of execution. The specification at page 6, lines 21-25 describe the inter-relationship between the elements, and not the order of their execution. It is obvious to one of skill in the art that the encoding of the predicates could execute before the creation of the nomenclature, or vice versa. Also, some algorithms may build the nomenclature and the encoded predicates in one step. Fig. 2 shows this interdependent relationship between the encoding of the predicates and the creation of the nomenclature by way of a bidirectional arrow interconnecting third means 15 and fourth means 16.

Thirdly, the Examiner asserts that the specification does not make clear what kind of analysis is actually being performed on the queries, and that it is not clear how the query is actually being translated into vectors.

The Examiner's attention is directed to page 6, lines 31-33 and page 7, lines 1-4, which describe the means for analyzing the query. As the specification clearly states, "the query analyzing means 21 translates the query into a set of vectors representing fields to be found" in encoded table 10 by looking for plaintext predicates and their usage within the query for "encoding the predicates" by means 22. Also, it is stated in the specification that the query is being translated into vectors "in accordance with the nomenclature of the

predicates 17." It is obvious that this encoded query is semantically equivalent to the original input query.

It is quite obvious, as it is well-known in the art, that the query translation may be performed using a variety of parsing or search methods to find and replace the predicates of the query with encoded predicates. How this translation is carried out is not a novelty of the invention and one familiar in the art can perform such translation without undue experimentation.

It is noted to the Examiner that reference to "authorized relations" has been removed from the Claims.

To satisfy the enablement requirement of 35 USC §112, first paragraph, the specification must teach those of skill in the art how to make and use the entire scope of the claimed invention without "undue experimentation" (see *In re Wright*, 27 U.S.P.Q.2d 1510, 11513 (Fed. Cir. 1993). The specification "need not teach, and preferably omits what is well known in the art" (*Spectra-Physics, Inc. v. Coherent, Inc.*, 3 U.S.P.Q.2d 1737, 1743 [Fed. Cir. 1987], *cert. denied*, 484 U.S. 954 [1987]). It is the Applicant's belief that the specification and claims fully meet the enablement requirement.

The Examiner also rejects now-cancelled Claims 13-34 under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. It is now believed that new Claims 35-52 fully meet the requirements of 35 U.S.C. §112, second paragraph.

Applicant respectfully requests reconsideration and withdrawal of the rejections. New Claims 35-52 are believed to be in condition for allowance, which is respectfully requested. Passage of the application to issue at an early date is therefore earnestly solicited.

There is no fee believe due with this Amendment. However, the Commissioner is hereby authorized to charge to deposit Account Number 50-1165 any fees not included herein, under 37 CFR §§ 1.16 and 1.17 that may be required by this paper and to credit any overpayment to that Account. A duplicate copy of this page is included for such purpose. If any additional extension of time is required in connection with the filing of this paper and has not been separately requested, such extension is hereby requested.

Respectfully submitted,

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